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August 25, 2020

VIA ECF

The Honorable James Orenstein
United States Magistrate Judge
Eastern District of New York
Courtroom 11D South
225 Cadman Plaza East
Brooklyn, New York 11201

Re: **Avelar v. Ciampa Management Corp., et al. 20-CV-210-AMD-JO (E.D.N.Y.)**

Dear Judge Orenstein:

This Firm represents the defendants Ciampa Management Corp., Douglas A. Ciampa and Victor Hidalgo in the above-referenced action (the "Action"). We write jointly with Nolan Klein, Esq., counsel for plaintiff Luis Avelar.

We wish to advise the Court that, pursuant to the Court's July 22, 2020 Order referring the Action to the EDNY Mediation Program, the parties conducted a mediation before Michael Starr, Esq., on August 24, 2020, by Zoom virtual session. As a result of that mediation session, the parties have reached an agreement in principle to settle the Action. However, in advance of formalizing the settlement and submitting the settlement agreement for *Cheeks* review, the parties would like to discuss certain aspects of the settlement with the Court.

Accordingly, we write to request a telephone or video conference at the Court's earliest convenience.

We thank the Court for its consideration.

Respectfully submitted,
PHILLIPS NIZER LLP
/s/ Laura E. Longobardi
Laura E. Longobardi

LEL:

cc: Nolan Klein, Esq. (via ECF)